

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MINNESOTA**

| | | |
|--|---|------------------------|
| In re: |) | Case No. 09-50779 |
| |) | |
| DENNIS E. HECKER, |) | Chapter 7 |
| |) | |
| Debtor. |) | Hon. Robert J. Kressel |
| |) | |
| <hr style="border: 0.5px solid black;"/> | | |
| CHRYSLER FINANCIAL SERVICES |) | |
| AMERICAS LLC, |) | |
| |) | |
| Plaintiff, |) | |
| |) | Adv. Pro. No. 09-05019 |
| v. |) | |
| |) | |
| DENNIS E. HECKER, |) | |
| |) | |
| Defendant. |) | |

**OBJECTION OF CHRYSLER FINANCIAL SERVICES AMERICAS, LLC TO
DEFENDANT’S MOTIONS FOR EXPEDITED RELIEF AND FOR AN ORDER
EXTENDING THE TIME FOR DEFENDANT TO ANSWER OR OTHERWISE
RESPOND TO PLAINTIFF’S COMPLAINT**

Chrysler Financial Services Americas LLC (“Chrysler Financial”), by and through counsel, submits this Objection (“Objection”) to the motions of Defendant Dennis E. Hecker (“Defendant” or “Hecker”) for expedited relief and for an order extending the time within which Defendant may answer or otherwise plead in response to Chrysler Financial’s Complaint herein. As we explain below, Chrysler Financial was willing to accommodate Defendant’s counsel’s vacation by extending the due date for Defendant’s response to the Complaint. Chrysler Financial merely asked that it be permitted to initiate discovery in the normal course in order to ensure that crucial documents and information are preserved. Defendant refused. Thus, the dispute here is

because Defendant insists on not only a deferral of his response to the Complaint but also a deferral of the initiation of discovery, which would prejudice Chrysler Financial. This Objection is based upon all of the files and records in this adversary proceeding, and upon the Affidavits of Stephen F. Grinnell and Nicholas N. Nierengarten. In support thereof, Chrysler Financial respectfully states as follows:

FACTUAL BACKGROUND

1. Chrysler Financial filed its Complaint commencing this adversary proceeding on July 8, 2009. The Clerk issued the Court's Summons on that date and on the same date the Summons and Complaint were served by mail upon the Defendant and his bankruptcy counsel of record. Also on July 8, 2009, the Summons and Complaint were served upon Defendant's current litigation counsel, William F. Mohrman, who had been representing Mr. Hecker with respect to Chrysler Financial since May 14, 2009. (Affidavit of Nicholas N. Nierengarten ("Nierengarten Aff."), Exs. 1-3))

2. The Defendant's Answer or other response to the Complaint is now due on or about August 7, 2009. Chrysler Financial understands that in accordance with the Court's usual practice, a scheduling order and order for trial would ordinarily be entered shortly after the Answer is filed establishing a comprehensive pre-trial schedule, fixing a trial date, and authorizing the commencement of discovery.¹

¹ Fed. R. Civ. P. 26(d)(1), applicable in adversary proceedings pursuant to Fed. R. Bankr. P. 7026, provides:

"A party may not seek discovery from any source before the parties have conferred as required by Rule 26(f), except in a proceeding exempted from initial disclosure under Rule 26(a)(1)(B), or when authorized by these rules, by stipulation, or by court order."

The Court's usual form of scheduling order provides that Fed. R. Civ. P. 26(f) (among other provisions of Fed. R. Civ. P. 26) will not apply in the adversary proceeding, thereby constituting the court order contemplated by Rule 26(d)(1) and permitting discovery to proceed.

3. On the afternoon of Friday, July 24, 2009 Mr. Mohrman contacted the undersigned counsel for Chrysler Financial and requested an extension of time to answer or otherwise plead in response to Chrysler Financial's Complaint herein until August 21, 2009, citing his long-planned family vacation. (Affidavit of Stephen F. Grinnell ("Grinnell Aff."), ¶ 3))

4. On Monday, July 27, 2009, after consulting with Chrysler Financial, undersigned counsel advised Mr. Mohrman that Chrysler Financial was willing to accommodate his vacation schedule and extend the deadline for responding to the Complaint as requested, with the understanding that Chrysler Financial would be permitted to initiate discovery on August 10, 2009, the date Chrysler Financial anticipated the Court would likely enter its scheduling order if the responsive pleading deadline were not extended. (Id. at ¶ 4) Undersigned counsel further advised Mr. Mohrman that while Chrysler Financial anticipated that it would notice depositions during his absence, it would agree not to take any depositions during his absence or before a reasonable period after his return. (Id.)

5. Mr. Mohrman advised that such an arrangement was not acceptable to him.

ARGUMENT

6. Although Chrysler Financial remains willing to accommodate Mr. Mohrman's vacation schedule (and apparently that of others in his office), it is important that discovery in this matter proceed in accordance with the rules and the Court's established practice as soon as possible so as to avoid prejudicing Chrysler Financial's interests. It is vitally important that Chrysler Financial be able to commence discovery at

the earliest possible date in order to ensure that any documents, testimony and other information relevant to the serious allegations made in its Complaint will be preserved and protected. In light of the specific allegations of the Complaint, and in light of press and other accounts of the Defendant's activities, it is critically important to bring the Court's authority to bear upon the preservation and production of evidence supporting Chrysler Financial's claims. Accordingly, as soon as it is authorized to do so, Chrysler Financial intends to commence written discovery and to take depositions of Mr. Hecker and other third parties, including a number of associates and former employees of Mr. Hecker's businesses. In the absence of prompt discovery (including document and deposition subpoenas directed to third parties), vital documentation and other information may very well disappear.

7. There would be absolutely no prejudice to the Defendant or his counsel if Chrysler Financial were permitted to initiate discovery in the usual course.

8. First, contrary to the suggestion in his Declaration, Mr. Hecker's counsel Mr. Mohrman is not new to Mr. Hecker's affairs or to the allegations set forth in Chrysler Financial's Complaint. In mid-May, 2009 Mr. Mohrman formally noted his appearance in the State Court proceedings in which Chrysler Financial secured its approximately \$477,000,000 judgment against the Defendant. (Nierengarten Aff., Exs. 1-3). Mr. Mohrman was also actively involved in discussions between Chrysler Financial and Mr. Hecker relating to Chrysler Financial's pursuit of post-judgment remedies, including the appointment of a receiver, which remedies were premised on the very same facts as are set forth in Chrysler Financial's complaint in this proceeding. (Grinnell Aff. ¶ 2; Nierengarten Aff., Exs. 1-3). Chrysler Financial's post-judgment efforts were stayed by

Mr. Hecker's bankruptcy filing. Mr. Mohrman also appeared as counsel for Mr. Hecker at the § 341 meeting of creditors. Thus, while the statement in Mr. Mohrman's Declaration that Mr. Hecker is "in the process of formally retaining" him may be technically accurate, any suggestion that he is new to the case, thereby necessitating a deferral of discovery, is false and misleading.

9. Second, as a justification for his request for an extension, Mr. Mohrman mentions his partner's vacation plans. However, there has been no indication that others in his office cannot attend to any of these matters in his absence, especially the routine task of forwarding document discovery to the client to begin the process of assembling responsive materials and other information.

9. Accordingly, for all of these reasons, Chrysler Financial respectfully submits that the motions should be denied.

Respectfully submitted.

Dated: July 29, 2009

GRAY, PLANT, MOOTY, MOOTY &
BENNETT, P.A.

By /e/ Stephen F. Grinnell
Stephen F. Grinnell (#37928)
Nicholas N. Nierengarten (#79169)
500 IDS Center
80 South Eighth Street
Minneapolis, Minnesota 55402
Telephone: 612-632-3070
Facsimile: 612-632-4070

MAYER BROWN LLP
Howard J. Roin (admitted pro hac vice)
Stuart M. Rozen (admitted pro hac vice)
71 South Wacker Drive
Chicago, Illinois 60606
Telephone: 312-782-0600
Facsimile: 312-701-7711

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MINNESOTA**

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| In re: |) | Case No. 09-50779 |
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| DENNIS E. HECKER, |) | Chapter 7 |
| |) | |
| Debtor. |) | Hon. Robert J. Kressel |
| |) | |
| <hr style="border: 0.5px solid black;"/> | | |
| CHRYSLER FINANCIAL SERVICES |) | |
| AMERICAS LLC, |) | |
| |) | |
| Plaintiff, |) | |
| |) | Adv. Pro. No. |
| v. |) | |
| |) | |
| DENNIS E. HECKER, |) | |
| |) | |
| Defendant. |) | |

**AFFIDAVIT OF STEPHEN F. GRINNELL IN SUPPORT OF CHRYSLER
FINANCIAL SERVICES AMERICAS LLC'S OBJECTION TO DEFENDANT'S
MOTIONS FOR EXPEDITED RELIEF AND FOR AN ORDER EXTENDING
THE TIME FOR DEFENDANT TO ANSWER OR OTHERWISE RESPOND TO
PLAINTIFF'S COMPLAINT**

Stephen F. Grinnell, having been first duly sworn, deposes and states as follows:

1. I am an attorney and principal with the law firm of Gray, Plant, Mooty, Mooty & Bennett, P.A., and am one of the attorneys for Chrysler Financial Services Americas, LLC ("Chrysler Financial") in the above-entitled action. I make this affidavit in support of Chrysler Financial Services Americas LLC's Objection to Defendant's motions for expedited relief and for an order extending the time for Defendant to answer or otherwise respond to Chrysler Financial's Complaint herein.

2. On June 4, 2009, prior to the commencement of the Defendant's bankruptcy case, I participated in a meeting with the Defendant (Mr. Hecker) and others,

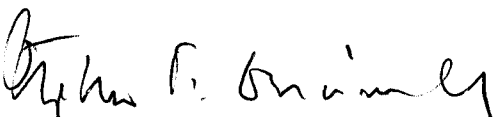
including Mr. Hecker's counsel William F. Mohrman (who participated by telephone), regarding certain post-judgment remedies Chrysler Financial intended to pursue, including the appointment of a receiver for Mr. Hecker. These remedies were premised on the very same facts as are set forth in Chrysler Financial's Complaint in this adversary proceeding. Based on the discussions at this meeting, it was clear that Mr. Mohrman was aware of and understood the nature of the claims asserted by Chrysler Financial in the present adversary proceeding.

3. On Friday afternoon, July 24, 2009, I received a telephone call from Mr. Mohrman. Mr. Mohrman said that the Defendant's Answer or other responsive pleading in this action was due on August 7, 2009. Mr. Mohrman requested an extension of the responsive pleading deadline to August 21, 2009, stating that he had a family vacation scheduled beginning August 5, 2009. I responded that I would consult with Chrysler Financial regarding his request and advise him as to Chrysler Financial's position.

4. On Monday morning, July 27, 2009, my partner Nick Nierengarten and I called Mr. Mohrman and advised him that Chrysler Financial would consent to the requested extension provided that, as part of a stipulation for an order extending the responsive pleading deadline, Chrysler Financial would be authorized to commence discovery starting on August 10, 2009. I indicated to Mr. Mohrman that I understood the Court's usual practice in adversary proceedings such as this was to enter a scheduling order and order for trial shortly after the Answer was filed, and that the entry of this Order would authorize the commencement of discovery. I said to Mr. Mohrman that Chrysler Financial did not seek to commence discovery sooner than it otherwise would be authorized to do so under the current schedule, but that it desired to commence

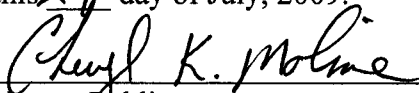
discovery as soon as it would be permitted to do if the responsive pleading deadline did not change. I also said to Mr. Mohrman that while Chrysler Financial intended as part of such discovery to notice various depositions, it would agree not to take such depositions before Mr. Mohrman returned to the office and during a reasonable period following such return. Mr. Mohrman said that such an arrangement was unacceptable to him.

5. Mr. Mohrman never said that another lawyer in his firm working on the case also would be out due to a vacation. Nor did he say that other members of his firm would be unable to cover the largely ministerial tasks associated with Chrysler Financial's commencement of discovery.

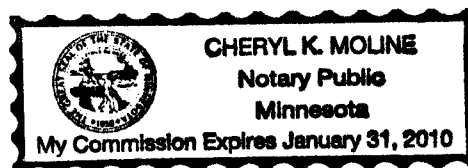


Stephen F. Grinnell

Subscribed and sworn to before me
this 29 day of July, 2009.



Notary Public



GP:2621187 v2

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MINNESOTA

| | | |
|-----------------------------|---|-------------------------|
| In re: |) | Case No. 09-50779 |
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| DENNIS E. HECKER, |) | Chapter 7 |
| |) | |
| Debtor. |) | Hon. Robert J. Kressel |
| |) | |
| CHRYSLER FINANCIAL SERVICES |) | |
| AMERICAS LLC, |) | |
| |) | |
| Plaintiff, |) | |
| |) | Adv. Pro. No.: 09-05019 |
| v. |) | |
| |) | |
| DENNIS E. HECKER, |) | |
| |) | |
| Defendant. |) | |

**AFFIDAVIT OF NICHOLAS N. NIERENGARTEN
IN SUPPORT OF CHRYSLER FINANCIAL SERVICES AMERICAS LLC'S
OBJECTION TO DEFENDANT'S MOTIONS FOR EXPEDITED RELIEF AND FOR AN
ORDER EXTENDING THE TIME FOR DEFENDANT TO ANSWER OR OTHERWISE
RESPOND TO PLAINTIFF'S COMPLAINT**

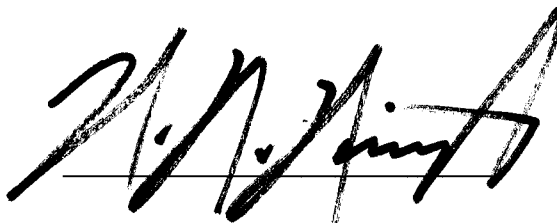
Nicholas N. Nierengarten, having being first duly sworn, depose and states as follows:

1. I am an attorney and principal with the law firm of Gray, Plant Mooty, Mooty & Bennett, P.A., and am one of the attorneys representing Plaintiff Chrysler Financial Services Americas LLC in the above-entitled action. I make this affidavit in support of Chrysler Financial Services Americas LLC's Objection to Defendant's motions for expedited relief and for an order extending the time for Defendant to answer or otherwise respond to Chrysler Financial's Complaint herein.

2. Attached hereto as Exhibit 1 is a true and correct copy of an email from William F. Mohrman to me dated May 14, 2009.

3. Attached hereto as Exhibit 2 is a true and correct copy of a facsimile cover sheet and attached letter from William F. Mohrman to the Court Administrator, Hennepin County District Court, dated May 14, 2009

4. Attached hereto as Exhibit 3 is a true and correct copy of a facsimile cover sheet and attached letter from Gregory M. Erickson, Mohrman & Kaardal, P.A. to the Honorable Marilyn B. Rosenbaum, Hennepin County District Court, dated May 20, 2009.



Nicholas N. Nierengarten

Subscribed and sworn to before me
this 29th day of July, 2009.



Notary Public

GP:2621083 v1

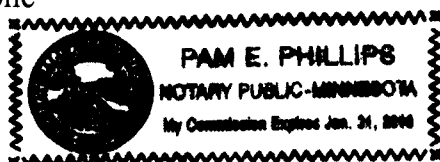


EXHIBIT 1

Nierengarten, Nicholas N.

From: Bill Mohrman [mohrman@mklaw.com]
Sent: Thursday, May 14, 2009 10:41 AM
To: Nierengarten, Nicholas N.
Subject: Chrysler v. Hecker

Dear Mr. Nierengarten:

By way of introduction, I am new counsel to Mr. Hecker in the Chrysler matter. I am sending you this email to request an extension of the deposition of ABRA. The request is two fold. First, because I have just been retained. Second, the Notice of Deposition was served on Mr. Hecker via mail on May 12, 2009. Under the Rules, service is not effective for three days until May 15, 2009 which is the date of the deposition. This is simply unreasonable under the Rules.

I am available on Wednesday and Friday of next week. Bill.

William F. Mohrman

Mohrman & Kaardal, P.A.
33 South Sixth Street
Suite 4100
Minneapolis, Minnesota 55402

Telephone - 612-465-0928
Facsimile - 612-341-1076

mohrman@mklaw.com
www.mklaw.com

To ensure compliance with requirements imposed by the Internal Revenue Service, we inform you that, unless expressly stated otherwise, any U.S. federal tax advice contained in this e-mail, including any attachments, was not intended or written to be used, and cannot be used, by any person for the purpose of (i) avoiding any penalties that may be imposed by the Internal Revenue Service, or (ii) promoting, marketing or recommending to another person any tax-related matter addressed herein.

The information in this e-mail is confidential and may be protected by the attorney's work product doctrine or the attorney/client privilege. It is intended solely for the addressee(s); access to anyone else is unauthorized. If this message has been sent to you in error, do not review, disseminate, distribute or copy it. Please reply to the sender that you have received the message in error, then delete it. Thank you

7/28/2009

EXHIBIT 1

for your cooperation.

7/28/2009

EXHIBIT 2

Mohrman & Kaardal, P.A.

*A Professional Association
Of Attorneys and Counsellors at Law*

*33 South Sixth Street
Suite 4100
Minneapolis, Minnesota 55402*

*Telephone: (612) 341-1074
Fax: (612) 341-1076*

FACSIMILE COVER LETTER

SENT TO: Nicholas N. Nierengarten **FACSIMILE NO.:** 612-632-4040

SENT BY: Mary Gynild **DATE:** May 14, 2009

SUBJECT Chrysler v Hecker

PAGES: 4 (including this sheet)

MESSAGE:

NOTICE - CONFIDENTIAL INFORMATION

The information in this fax communication is privileged and strictly confidential. It is intended solely for the use of the individual or entity named above. If the reader of this message is not the intended recipient, or the employee or agent responsible to deliver it to the intended recipient, any dissemination, distribution, copying or other use of the information contained in this communication is strictly prohibited. If you have received this communication in error, please first notify the sender immediately at the above telephone number of your erroneous receipt and then return this fax communication at once to the sender at the above address either via United States Postal Service or by the method of delivery specified by the sender.

EXHIBIT 2

MOHRMAN & KAARDAL, P.A.

ATTORNEYS AND COUNSELORS AT LAW

33 SOUTH SIXTH STREET
SUITE 4100
MINNEAPOLIS, MINNESOTA 55402

WILLIAM F. MOHRMAN

TELEPHONE: 612/341-1074
FACSIMILE: 612/341-1076
WRITER'S E-MAIL: MOHRMAN@MKLAW.COM

May 14, 2009

Via U.S. Mail

Court Administrator
Hennepin County District Court
Civil Filing
300 South Sixth Street
Minneapolis, Minnesota 55487

Re: Chrysler Financial Services Americas LLC v. Dennis E. Hecker
Court File No. 27-CV-09-2152

Dear Court Administrator:

Enclosed for filing in the above referenced matter are the following:

1. Notice of Appearance; and
2. Affidavit of Service.

If you have any questions or concerns, do not hesitate to contact me.

Very truly yours,


William F. Mohrman

WFM/mg
Enclosures

Cc: Nicholas N. Nierengarten (w/enc)(via fax and mail)

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF HENNEPIN

FOURTH JUDICIAL DISTRICT

Chrysler Financial Services Americas LLC, as
successor in interest to DiamlerChrysler
Services North America LLC and
DiamlerChrysler Financial Services Americas
LLC,

Case Type: Breach of Contract

Court File No. 27-CV-09-2152

Plaintiff,

NOTICE OF APPEARANCE

v.

Dennis E. Hecker,

Defendant.

The undersigned attorney hereby notifies the court and counsel that William F. Mohrman
of Mohrman & Kaardal, P.A. shall appear as counsel of record for Defendant Dennis E. Hecker
in the above-entitled proceeding.


MOHRMAN & KAARDAL, P.A.

Dated: May 14, 2009.

William F. Mohrman, #168816
33 South Sixth Street, Suite 4100
Minneapolis, Minnesota 55402
Telephone: (612) 341-1074

Attorneys for Defendant Dennis E. Hecker

Chrysler Financial Services Americas LLC v. Dennis E. Hecker
Court File No. 27-CV-09-2152

AFFIDAVIT OF SERVICE

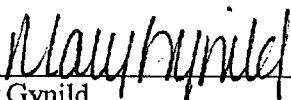
STATE OF MINNESOTA)
) ss.
COUNTY OF HENNEPIN)

Mary Gynild, of the City of Minneapolis, County of Hennepin, State of Minnesota, being affirmed on oath, says that on the 14th day of May, 2009 she served the following:

- Notice of Appearance;

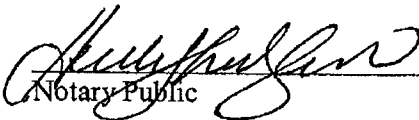
on the following party in this action, by faxing a true and correct copy thereof, directed to the below-referenced attorney at the last known fax number and by mailing a true and correct copy thereof, enclosed in an envelope, postage for first class mail prepaid, and by depositing same at the post office in Minneapolis, Minnesota, and directed to the following at the last known address:

Nicholas N. Nierengarten
Gray, Plant, Mooty, Mooty & Bennett, P.A.
80 South Eighth Street, Suite 500
Minneapolis, Minnesota 55402
Facsimile: 612-632-4040



Mary Gynild

Subscribed and affirmed to before me
this 14th day of May, 2009.



Notary Public

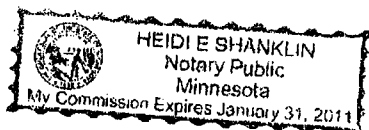


EXHIBIT 3

Mohrman & Kaardal, P.A.

*A Professional Association
Of Attorneys and Counsellors at Law*

*33 South Sixth Street
Suite 4100
Minneapolis, Minnesota 55402*

*Telephone: (612) 341-1074
Fax: (612) 341-1076*

FACSIMILE COVER LETTER

SENT TO: Nicholas N. Nierengarten **FACSIMILE NO.:** 612-632-4040
SENT BY: Mary Gynild **DATE:** May 20, 2009
SUBJECT Chrysler v Hecker
PAGES: 3 (including this sheet)
MESSAGE:

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EXHIBIT 3

MOHRMAN & KAARDAL, P.A.

ATTORNEYS AND COUNSELORS AT LAW

33 SOUTH SIXTH STREET
SUITE 4100
MINNEAPOLIS, MINNESOTA 55402

WILLIAM F. MOHRMAN

TELEPHONE: 612/341-1074
FACSIMILE: 612/341-1076
WRITER'S E-MAIL: MOHRMAN@MKLAW.COM

May 20, 2009

Via Facsimile and U.S. Mail

The Honorable Marilyn B. Rosenbaum
Hennepin County District Court
Chambers C1920
300 South Sixth Street
Minneapolis, Minnesota 55487

Re: Chrysler Financial Services Americas LLC v. Dennis E. Hecker
Court File No. 27-CV-09-2152

Dear Judge Rosenbaum:

Enclosed is a copy of the Notice of Appearance submitted for filing on May 15, 2009.
Our law firm currently represents Dennis E. Hecker in all post-judgment actions in the above
referenced matter.

Very truly yours,



Gregory M. Erickson

GME/mg
Enclosure

Cc: Nicholas N. Nierengarten (w/enc)(via fax and mail)
Erik Dove (w/enc)(via mail)

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF HENNEPIN

FOURTH JUDICIAL DISTRICT

Chrysler Financial Services Americas LLC, as
successor in interest to DiamlerChrysler
Services North America LLC and
DiamlerChrysler Financial Services Americas
LLC,

Case Type: Breach of Contract

Court File No. 27-CV-09-2152

Plaintiff,

NOTICE OF APPEARANCE

v.

Dennis E. Hecker,

Defendant.

The undersigned attorney hereby notifies the court and counsel that William F. Mohrman
of Mohrman & Kaardal, P.A. shall appear as counsel of record for Defendant Dennis E. Hecker
in the above-entitled proceeding.


MOHRMAN & KAARDAL, P.A.

Dated: May 14, 2009.

William F. Mohrman, #168816
33 South Sixth Street, Suite 4100
Minneapolis, Minnesota 55402
Telephone: (612) 341-1074

Attorneys for Defendant Dennis E. Hecker

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MINNESOTA**

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| In Re: |) Case No. 09-50779 |
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| DENNIS E. HECKER, |) Chapter 7 |
| |) |
| Debtor. |) Hon. Robert J. Kressel |
| |) |
| CHRYSLER FINANCIAL SERVICES |) |
| AMERICAS LLC, |) |
| |) |
| Plaintiff, |) |
| |) Adv. Pro. No. |
| v. |) |
| |) |
| DENNIS E. HECKER, |) |
| |) |
| Defendant. |) |

CERTIFICATE OF SERVICE

I, Stephen F. Grinnell, hereby certify that on July 29, 2009, I caused the following:

1. Objection of Chrysler Financial Services Americas, LLC to Defendant's Motions for Expedited Relief and for an Order Extending the Time for Defendant to Answer or Otherwise Respond to Plaintiff's Complaint;
2. Affidavit of Nicholas N. Nierengarten in Support of Chrysler Financial Services Americas, LLC's Objection to Defendant's Motions for Expedited Relief and for an Order Extending the Time for Defendant to Answer or Otherwise Respond to Plaintiff's Complaint;
3. Affidavit of Stephen F. Grinnell in Support of Chrysler Financial Services Americas, LLC's Objection to Defendant's Motions for Expedited Relief and for an Order Extending the Time for Defendant to Answer or Otherwise Respond to Plaintiff's Complaint; and
4. Order.

to be filed electronically with the Clerk of Court through ECF, and that ECF will send an e-notice of the electronic filing to the following:

Gregory Erickson
William F. Mohrman
Mohrman and Kaardal, P.A.
33 South 6th Street, Ste. 4100
Minneapolis, MN 55402-3601

I further certify that I caused a copy of the foregoing documents to be served upon Defendant's counsel by e-mail at the following address: mohrman@mklaw.com

Dated: July 29, 2009

GRAY, PLANT, MOOTY
MOOTY & BENNETT, P.A.

/e/ Stephen F. Grinnell
Stephen F. Grinnell (#37928)

GP:2610659 v1

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MINNESOTA**

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| In re: |) | Case No. 09-50779 |
| |) | |
| DENNIS E. HECKER, |) | Chapter 7 |
| |) | |
| Debtor. |) | Hon. Robert J. Kressel |
| |) | |
| <hr/> | | |
| CHRYSLER FINANCIAL SERVICES |) | |
| AMERICAS LLC, |) | |
| |) | |
| Plaintiff, |) | |
| |) | Adv. Pro. No. 09-05019 |
| v. |) | |
| |) | |
| DENNIS E. HECKER, |) | |
| |) | |
| Defendant. |) | |

ORDER

This matter came before the Court for hearing on July 30, 2009 on Defendant's Motions for orders authorizing expedited relief and extending the time within which Defendant may answer or otherwise respond to Plaintiff's complaint herein.

Appearances were as noted on the record.

Based on the parties' submissions, the arguments of counsel and all of the files and records in this proceeding,

IT IS HEREBY ORDERED:

Defendant's Motions are denied.

Dated: July __, 2009.

Robert J. Kressel
United States Bankruptcy Judge